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May 23, 2013

Hon. Dora L. Irizarry
U. S. District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Thaqi, 11-cr-486 (DLI)

Dear Judge Irizarry:

I write on behalf of counsel for Martino Cekaj and Faik Memheti requesting additional time to file objections to their respective pre sentence investigation reports. Messrs. Cekaj and Mehmeti plead guilty pursuant to a plea agreement in November of 2012. We received the probation report last week and are now confronted with estimated guideline calculations that more than double the estimated guideline levels in the plea agreement, as well as factual allegations that we must investigate and address.

As such, we ask for additional time to file objections to the pre sentence report, making those objections due on June 6, 2013. The government consents to this application. Importantly, we do not wish to disturb the scheduled sentence dates which are June 28, 2013 for Faik Mehmeti, and July 12, 2013 for Martino Cekaj. However, if the Court feels that additional time is necessary, we, and the government, have no objection.

Respectfully submitted,

/s/
Nicholas J. Pinto

cc: AUSA Steven Tiscione
AUSA Gina Parlovecchio